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A Community Partnership for Salmon

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Wildcat Steelhead Club
Wild Steelhead Coalition

October 7, 2015

Scott Schuyler
Natural Resources Department
Upper Skagit Indian Tribe
25944 Community Plaza Way
Sedro-Woolley, WA 98273

RE: Goodell Creek Restoration Feasibility Study

Dear Mr. Schuyler,

After careful review and discussions among the members of the Skagit Watershed Council (SWC) Board of Directors and other committees, I'd like to express our support for the Upper Skagit Indian Tribe's ("The Tribe") current proposal to the Salmon Recovery Funding Board (SRFB) titled Goodell Creek Restoration Feasibility, #15-1174. We understand the SRFB's Review Panel has initially designated it a Project of Concern (POC), however we feel strongly that this designation is out of sequence as the justification cited is not applicable to a feasibility study that is clearly meant to address the concerns presented.

First, we would like to share our appreciation for the Tribe's independent funding of an earlier study assessing current conditions and a wide range of alternatives for addressing a deteriorating situation in the Goodell Creek alluvial fan, which is also a high priority for the Skagit Watershed Council and salmon habitat in the basin (SWC 2015 Strategic Approach). These large, nearly pristine tributaries in the upper Skagit River with wholly protected watersheds are both current and likely future refugia for long-term climate change, functioning as the primary strongholds for multiple salmonid species in Puget Sound. Identification and remediation of the few habitat impacts in these watersheds provide the greatest opportunity to fulfill the intrinsic value of these otherwise pristine habitats and their habitat forming processes. Where else should restoration occur if not here?

SWC believes the Tribe's final application thoughtfully re-oriented and strengthened the proposal to fully address comments provided by the SWC Technical Review Committee (and to a large degree the SRFB Review Panel). This additional effort demonstrates a strong and more formalized sense of ownership between the multiple governmental organizations with a role in eventual habitat restoration and infrastructure maintenance in the Goodell Creek watershed.

SWC believes that the Review Panel's two-paragraph justification provided in categorizing the project as a POC draws a premature and inaccurate conclusion. The first comment provided either misunderstands or mischaracterizes the proposal's honestly stated

objective that the design work will be helpful if there is an emergency response to a catastrophic avulsion. Instead, as the proposal states, we understand that the intent is to develop a collective, proactive effort to construct cost effective solutions for fish and civil works before the predicted avulsion event occurs.

On the Review Panel's second point, SWC both agrees and disagrees. It stands as a truism that SWC's mission is focused on sustainable fisheries, and not the fulfillment of civil works for society's sake. While this project is conceived as a fish habitat restoration project to meet SWC's priority objectives, it is also true that successfully addressing those objectives will provide multiple benefits for society's past and future cultural heritage, transportation, and economic vitality. To that end, it stands to reason that one of the Tribe's stated purposes of this proposal is to develop a broad partnership to bring additional resources to bear, which will more efficiently meet the needs of salmon recovery funding agencies. However, at the same time, SRFB policy has been to incentivize and accelerate habitat investments despite the underlying ownership, unless there is an existing legal requirement by that landowner. The Skagit Watershed Council's review and approval of this project worked within those policy perspectives. SWC will seek to open a dialogue with the SRFB and its Review Panel to discuss these policies further.

SWC is confident in the Tribe's proposed next steps and ability to find a long-term solution to the emerging problems at the Goodell Creek alluvial fan. Please do let me know if there is anything further from SWC that would be helpful as the conversation continues.

Sincerely,

A handwritten signature in blue ink that reads "Richard Brocksmitth". The signature is written in a cursive, slightly stylized font.

Richard Brocksmitth
Executive Director